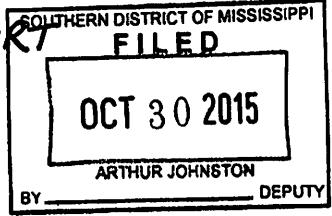


IN THE UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
 SOUTHERN DIVISION



THAD EVERETT DELAUGHTER
 v.

RONALD WOODALL, et al.

PLAINTIFF
 NO. 1:14-cv-18-JCG

DEFENDANTS

MOTION FOR SANCTIONS

COMES Now, Thad DeLaughter, the Plaintiff herein, and presents this MOTION FOR SANCTIONS, requesting this Court to impose the same upon Defendants Michael Hatten and State of Mississippi pursuant to F.R.Cv.P.-11(c)(2), and respectfully shows that:

1. These Defendants have moved for Summary Judgment [81, 82] based on a defense of Sovereign and Qualified Immunity;¹
2. Plaintiff filed his [96, 97] Response thereto on May 28, 2015;
3. These Defendants requested additional time to file a Reply, which time awarded by this Court and unopposed by the Plaintiff was set to terminate on June 25, 2015;²
4. Defendants' requests for additional time to file a Reply were premised on "personal reasons" [99] and, later, a

¹ Although the Motion for Summary Judgment was filed with the Court on April 20, 2015, the Plaintiff did not receive a copy until June 24, 2015.

² Defendants requested an initial 7 days [99], and additional 14 days [100].

busy schedule and pending trial [100], and purportedly "not made in an attempt to delay this proceeding";

5. As of September 15, 2015, over 100 days have lapsed since the Plaintiff's [96, 97] Response and the Defendants have not filed their indicated Reply;
6. These Defendants have defaulted on their Reply, having exceeded the allotted time to file the same after misrepresenting their intention to the Court in violation of F.R.Cv.P. - 11(b), and should face appropriate Sanctions for the unnecessary delay in the proceedings;
7. These Defendants have on several occasions filed documents with the Court while failing to serve the Plaintiff with the same so that, without this Court's intervention, this practice would greatly prohibit the Plaintiff from litigating his meritorious claims;

WHEREFORE, PREMISES CONSIDERED, the Plaintiff moves this Most-Honorable Court to impose Sanctions upon the Defendants Michael Hatten and State of Mississippi for their purposeful delay in these proceedings; and any other relief as is appropriate under the circumstances.

RESPECTFULLY submitted, this the 24 day of September, 2015.

Is/ Thad Delaughter
Thad Everett Delaughter
SMCI-2
P.O. Box 1419
Leakesville, MS 39451

CERTIFICATE OF SERVICE

This is to certify that I, Thad Everett Delaughter, the Plaintiff herein, have caused to be mailed via U.S. Postal Service, postage prepaid, a true and correct copy of the foregoing MOTION FOR SANCTIONS to the following:

Clerk, U.S. District Court
Southern Division
2012 15th St., Suite 403
Gulfport, MS 39501

Tommy Goodwin
Special Asst. Attorney General
P.O. Box 220
Jackson, MS 39205

This the 29 day of October, 2015.

/s) Thad Everett Delaughter
Plaintiff